

# REGIONAL WASTE MANAGEMENT AUTHORITY

Serving Sutter County, Yuba County, Live Oak, Marysville, Wheatland and Yuba City

October 18, 2004

Ms. Sally French  
Special Waste Division, MS—22  
California Integrated Waste Management Board  
P.O. Box 4025  
Sacramento, California 95812-4025

## **Re: Waste Tire Amnesty Day Grants and the Five-Year Tire Management Plan Update**

Dear Ms. French:

I am writing to submit comments regarding the parameters for Waste Tire Amnesty Grants relative to the Five-Year Tire Management Plan that is currently being updated. Over the past five years, the Regional Waste Management Authority (RWMA) has developed and refined a waste tire amnesty program that provides for the efficient collection of used and waste tires from residents at existing facilities using existing staff resources and within the budget established for each grant program. The RWMA's program is briefly described below followed by a list of benefits associated with the approach established for the RWMA's waste tire amnesty program.

In addition to educating the public about tire safety issues related to extending the useful life of tires and the health and safety issues related to improper storage and disposal of used and waste tires, the availability of free tire disposal (recycling) vouchers has been promoted each July. Yuba-Sutter residents call the RWMA office to request a free tire disposal voucher(s) for up to nineteen tires per household. The vouchers allow the recipients to take the designated number of tires to one of the local transfer stations at their convenience any time within one month of the date of issuance. On the reverse side of each voucher, conditions approved by the LEA are presented for residents who are transporting more than nine used and waste tires. Vouchers are issued on a first come, first served basis until the maximum number of tires budgeted for are collected. This normally occurs within four months of the program commencement.

The benefits associated with the approach established for the RWMA's waste tire amnesty program described above include:

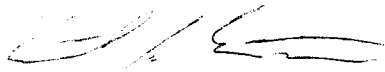
- Free Tire Disposal Vouchers are distributed only to residents which limits program access by tire dealers.
- The voucher program limits each household to 19 tires per cycle which allows more residents to participate in the program.
- The voucher program facilitates participation by residents by allowing them to transport tires at their convenience because the Marysville Transfer Station is open seven days a week and the Ponderosa Transfer Station is open three days a week.

- Because residents can transport their tires at their convenience, the associated increase in transfer station activity is spread over a four-month period thereby reducing the local traffic impact and allowing for the use of existing facilities and staff. Specific amnesty day events held at other locations would increase the cost of the program due to facility and staffing requirements, as well as requiring traffic control assistance.
- The voucher program also allows the RWMA to control the number of tires received to prevent the program budget from being exceeded or the turning away of residents with tires from an event which other jurisdictions have had to do with the possible unintended result being increased illegal dumping and/or diminished public relations.

The RWMA was not able to continue with this effective approach under the recent Waste Tire Amnesty Day Grant application because of the limitation of holding no more than two amnesty day events at the same location per month. While the RWMA proposed a modified approach in its most recent grant application, this modified approach will likely result in having to increase staffing at the Marysville Transfer Station on the two Saturdays per month on which events are held. Modification of the Waste Tire Amnesty Day Grant program parameters through the Five-Year Tire Management Plan update to allow amnesty voucher programs operating for a limited period of time would provide for implementation of efficient and effective programs such as the one developed by the RWMA.

Thank you for the opportunity to submit these comments. Please feel free to contact me if you have any questions or would like additional information regarding tire collection and recycling programs in the Yuba-Sutter region.

Sincerely,



Keith Martin  
Administrator

CC: CIWMB Board Members  
Mitch Delmage, Special Waste Division, CIWMB